

***Estancias de Cerro Mar, Inc.***  
*Call Box 1370, Dorado Puerto Rico 00646*  
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October 26, 2015

**BY MESSENGER**

Eng. Nancy Rodríguez, Chief  
Multimedia Permits and Compliance Branch  
Caribbean Environmental Protection Division  
U.S. Environmental Protection Agency, Region 2  
City View Plaza II, Suite 7000 48 RD. 165 Km. 1.2  
Guaynabo, PR 00968-8069

Attention: Mr. Jaime López - Multimedia Permits and Compliance Branch  
Caribbean Environmental Protection Division  
U.S. Environmental Protection Agency, Region 2

RE: Administrative Compliance Order - Docket No. CWA-02-2015-3110  
Palmas de Cerro Gordo Development Pump Station  
NPDES Tracking Number PRU020631

Dear Eng. Rodríguez:

Estancias de Cerromar, Inc. ("Estancias") is hereby submitting the Compliance Plan, the Summary of Events, the Preventive Maintenance Plan and Summary of Costs required under VI of the Administrative Compliance Order Docket Number CWA-02-2015-3110 (the "Order").

As discussed before with EPA representatives, Estancias is engaged with Puerto Rico Aqueduct and Sewer Authority ("PRASA") in the process to transfer the referenced Pump Station to the latter. The transfer process has taken more time than anticipated. Estancias is currently awaiting the response from PRASA on the approval of equipment to be acquired and installed at the Pump Station in order to avoid the acquisition and installation of expensive equipment which without that prior approval from PRASA could later on be rejected by the such agency and hinder the transfer. Notwithstanding the foregoing, Estancias reiterates its commitment to the orderly operation of the Pump Station and completion of the necessary repairs.

In compliance with the provisions of Section 7, Paragraph 60 of the Order:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate,



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and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Should you have any questions regarding the foregoing, you can contact us at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Spector", with a stylized, flowing script.

Michael Spector

- c. Wanda García Hernández, Acting Director  
Water Quality Area  
Environmental Quality Board  
P.O. Box 11488  
San Juan, Puerto Rico 00910

Administrative Compliance Order - Docket Number CWA-02-2015-3110 (the Order)  
Estancias de Cerromar Corporation (the "Company")

The Preventive Maintenance Plan is provided under the provisions Paragraph 5I of the Order:

Task	Description of Maintenance Procedure	Weekly	Contractor
Inspection	<p>Inspection of operational conditions of all equipment at Pump Station:</p> <ul style="list-style-type: none"> <li>✓ Pumps</li> <li>✓ Sump</li> <li>✓ Chamber and bar Screens</li> <li>✓ Valves</li> <li>✓ Chains</li> <li>✓ Emergency Generator</li> <li>✓ Luminaries</li> <li>✓ Hoses and dike of Diesel tank for Emergency generator</li> <li>✓ Drainage for Check Valve</li> <li>✓ Electric Panel Amperage</li> <li>✓ Level floats</li> </ul>	Weekly	<p>Clean4All Environmental Cleaning Services</p> <p>Several employees are used by the contractor</p>
Maintenance	Pumps - will be removed and re-installed after check for debris and/or obstructions. Clean up and repairs will be done as needed.	Monthly	<p>Clean4All Environmental Cleaning Services</p> <p>Several employees are used by the contractor</p>
	Sump manhole - is opened and cleaned to remove any debris.	Weekly	<p>Clean4All Environmental Cleaning Services</p> <p>Several employees are used by the contractor</p>
	Sump - is emptied and cleaned	Every six months	<p>Clean4All Environmental Cleaning Services</p> <p>Several employees are used by the contractor</p>
	Chamber and Bar Screens - are cleaned to remove any debris.	Weekly	<p>Clean4All Environmental Cleaning Services</p> <p>Several employees are used by the contractor</p>
	Discharge pipe -painting to avoid corrosion. Repairs will be done as needed.	Every six months	<p>Clean4All Environmental Cleaning Services</p>

Task	Description of Maintenance Procedure	Weekly	Contractor
			Several employees are used by the contractor
	Exhaust Fan – is started for voltage and amperage testing. Repairs will be done as needed.	Weekly	Clean4All Environmental Cleaning Services Several employees are used by the contractor
	Transformers – are checked voltage and amperage testing. Repairs will be done as needed.	Monthly	Clean4All Environmental Cleaning Services Several employees are used by the contractor
	Emergency Generator – is checked to verify that is starting and performing the weekly preventive startup.	Weekly	Clean4All Environmental Cleaning Services Several employees are used by the contractor
	Drainage Valve for Diesel Dike – is checked and any debris is removed.	Weekly	Clean4All Environmental Cleaning Services Several employees are used by the contractor
	Shaft for the entrance valves – is checked and properly greased.	Weekly	Clean4All Environmental Cleaning Services Several employees are used by the contractor
	Valve box – is checked and any debris is removed.	Weekly	Clean4All Environmental Cleaning Services Several employees are used by the contractor
	Exterior Lighting – is checked for replacement of light bulbs.	Weekly	Clean4All Environmental Cleaning Services Several employees are used by the contractor
	Fire Extinguisher – is checked for condition and replaced as needed.	Weekly	Clean4All Environmental Cleaning Services

Task	Description of Maintenance Procedure	Weekly	Contractor
			Several employees are used by the contractor
	Safety Signage – checked and replaced as needed.	Weekly	Clean4All Environmental Cleaning Services Several employees are used by the contractor
	Painting of structures – redone and maintained as need.	Every six months	Clean4All Environmental Cleaning Services Several employees are used by the contractor
	Housekeeping – general cleanup (e.g., sweeping and collection of leaves and debris) at the pump Station facilities and immediate area for housekeeping.	Weekly	Clean4All Environmental Cleaning Services Several employees are used by the contractor

Note: A routine log will be kept for the aforesaid maintenance activities.

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Estancias de Cerromar Corporation (the "Company")

The Compliance Plan and Costs Report is provided under the provisions Paragraphs 49 and 53 of the Order:

Equipment	Description of Work	Status	Cost Incurred	Costs Projected
Pumps	The existing pumps were repaired and installed at the pump station.	Completed as of September 15, 2015  Maintenance work was performed on September 30, 2015.	\$4,460.00 <sup>1</sup> \$840.00 <sup>2</sup>	
	Acquisition of new pumps	Pending confirmation from PRASA representatives.  Installation should take place within 12 weeks from the date of approval by PRASA, since the pumps are custom built.		\$41,493.61
Electricity	Licensed electrician checked all electric equipment, including emergency generator and transfer switch.	Completed.	\$448.00 <sup>3</sup>	
Wet well (sump)	The sump was fully cleaned and all debris was removed and adequately disposed. Rod Rodder services were used for the work.	Completed in April 14, 2015.	\$5,200.20 <sup>4</sup> \$10,807.10 <sup>5</sup>	
		Maintenance Cleanup performed on October 8, 2015.	\$1,338.00 <sup>6</sup> \$1,362.12 <sup>7</sup>	
Grinder	The Company obtained a quote for the replacement of the grinder and submitted the same to PRASA for approval.	Pending confirmation from PRASA representatives.  Note that as per the March 4, 2015 communication from Héctor Quiñones, Director of PRASA's Compliance Division, PRASA has not determined		\$23,273.00

<sup>1</sup> Repairs of the two pumps. Contractor: Mesa Pumps.

<sup>2</sup> Seal for one of the pumps. Contractor: Mesa Pumps.

<sup>3</sup> Contractor: Mesa Pumps.

<sup>4</sup> To empty sump manually with trucks and cleanup. Contractor Rod Rodder.

<sup>5</sup> Use of trucks to control sump levels and prevent overflows. Contractor Rod Rodder.

<sup>6</sup> For the full cleanup of the sump. Contractor: Rod Rodder.

<sup>7</sup> Installation and use/operation of additional pump to maintain levels at the sump. Contractor: Puerto Rico Wire Product, Inc.

Equipment	Description of Work	Status	Cost Incurred	Costs Projected
		whether the grinder will be required to be installed as part of the ongoing transfer process of the Pump Station.		
Chamber and Bar Screens	Clean up of the chambers using the services of Rod Rodder. The services of Clean for All were used for the cleanup of the bar screen.	Completed as of September 30, 2015.	\$260.00 <sup>8</sup>	
Street cleanup	Street was cleaned and debris removed.	Performed on May 1, 2015.	---	---
Discharge pipe	Was inspected by contractor and is undergoing maintenance for corrosion.	Scheduled to be completed by on or before October 30, 2015.	Invoice pending	
Exhaust Fan	The Company obtained a quote for the replacement of this equipment and submitted the same to PRASA for approval.	Acquisition is pending confirmation from PRASA representatives.		\$5,289.16 <sup>9</sup>
Transformers	The Company obtained a quote for the replacement of this equipment and submitted the same to PRASA for approval.	Acquisition is pending confirmation from PRASA representatives.  Installation should take place within 3-4 weeks from the date of approval by PRASA.		4,399.21 <sup>10</sup> 2,200.00 <sup>11</sup>
Emergency Generator	Was inspected and is in good operation.	Completed	Invoice pending	
Drainage Valve for Diesel Dike	Was replaced by contractor.	Completed.	Invoice pending	
Support for level floats	Was replaced and installed. Level floats are operational.	Completed on September 30, 2015	Invoice pending	

<sup>8</sup> Clean4All Environmental Cleaning Services.

<sup>9</sup> Composite Fan Technology of PR, Inc.

<sup>10</sup> Roger Electric.

<sup>11</sup> Vélez Electric.

Equipment	Description of Work	Status	Cost Incurred	Costs Projected
Shaft and entrance valves	Was repaired and is operational.	Completed on September 15, 2015	\$865.00 <sup>12</sup>	
Valve box	Drainage was cleaned and box is empty.		Invoice pending	
Exterior Lighting	Luminaires are been acquired	Installation is scheduled to be completed on or before next week.	Invoice pending	
Fire Extinguisher	Replacement of fire extinguisher.	Acquisition and installation is scheduled to be completed on or before the week of October 26, 2015.	Invoice pending	
Dielectric carpet	Acquisition and installation dielectric carpet.	Completed on September 15, 2015.	Invoice pending	
Safety Signage	Installation of signage	Completed.	Invoice pending	

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<sup>12</sup> Clean4All Environmental Cleaning Services.



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The following summary is provided under the provisions Paragraph 50 of the Order:

Date	Observations	Measures Taken	Estimated Flow
September 19, 2014	Pumps were clogged.	As soon as information of the event was received, the pumps were inspected and cleaned.	Approximately 150 Gal.
October 14, 2014	Pump's breaker went out of operation ( <i>tumbado</i> ) due to fluctuation of voltage in the area.	As soon as information of the event was received, the pumps were inspected and breaker was manually reactivated. Pumps resumed operation in automatic mode.	Approximately 100 Gal.
October 30, 2014	Sump levels fluctuating rapidly, during a rain event. Stormwater infiltration into sewer system is suspected.	As soon as information of the event was received, the pumps were inspected and found to be working normally.	Approximately 150 Gal.
November 7, 2014	Sump levels fluctuating rapidly, during a rain event. Stormwater infiltration into sewer system is suspected.	As soon as information of the event was received, the pumps were inspected and found to be working normally.	Approximately 150 Gal.
November 8, 2014	Sump levels fluctuating rapidly, during a rain event. Stormwater infiltration into sewer system is suspected.	As soon as information of the event was received, the pumps were inspected and were found to be working normally.	Approximately 150 Gal.
November 22, 2014	Sump level was high.	As soon as information of the event was received, the pumps were inspected and cleaned	Approximately 100 Gal.
December 15, 2014	Sump level increased.	As soon as information of the event was received, the pumps were inspected. No obstruction was found. The pumps found were clean.	Approximately 150 Gal.
December 16, 2014	Sump level increased.	As soon as information of the event was received, the pumps were inspected. No obstruction was found. The pumps were clean.	Approximately 100 Gal.
January 18, 2015	Sump level increased. Pump's breaker went out of operation ( <i>tumbado</i> ) due to	As soon as information of the event was received, the pumps were inspected and breaker was	Approximately 200 Gal.

Date	Observations	Measures Taken	Estimated Flow
	fluctuation of voltage in the area.	manually reactivated. Pumps resumed operation in automatic mode.	
January 30, 2015	Sump level was high.	As soon as information of the event was received, the pumps were inspected were cleaned and resumed operation.	Approximately 100 Gal.
February 7, 2015	Sump level was high.	As soon as information of the event was received, the pumps were inspected were cleaned and resumed operation.	Approximately 200 Gal.
February 14, 2015	Sump level was high.	As soon as information of the event was received, the pumps were inspected, removed and cleaned.	Approximately 150 Gal.
February 15, 2015	Sump levels fluctuating rapidly, during a rain event. Stormwater infiltration into sewer system is suspected.	As soon as information of the event was received, the pumps were inspected and found clean.	Approximately 450 Gal.
February 16, 2015	Sump levels fluctuating rapidly, during a rain event. Stormwater infiltration into sewer system is suspected.	As soon as information of the event was received, the pumps were inspected and found clean.	Approximately 450 Gal.
February 17, 2015	Sump levels fluctuating rapidly, during a rain event. Stormwater infiltration into sewer system is suspected.	As soon as information of the event was received, the pumps were inspected and found clean.	Approximately 450 Gal.
March 23, 2015	Sump level was high.	Pumps were inspected and cleaned. One pump was functioning.	Approximately 150 Gal.
March 27, 2015	Sump level was high.	As soon as information of the event was received, the pumps were inspected and found clean. One pump was functioning.	Approximately 200 Gal.
March 28 – April 6, 2015	Sewer mainline appeared to be clogged and affecting the pump station.	As soon as information of the event was received, the pumps were inspected and were clean.	Approximately 150 Gal.
April 8 – 14, 2015	Sewer mainline appeared to be clogged and affecting the pump station.	As soon as information of the event was received, communication was established	Approximately 500 Gal.

Date	Observations	Measures Taken	Estimated Flow
		with PRASA personnel but the agency did not provide any assistance. Additional pump was installed and Rod Rodder services were used daily to control sump levels and avoid overflows.	
April 18 – 19, 2015	Sewer mainline appeared to be clogged and affecting the pump station.	As soon as information of the event was received, the pumps were inspected and were found to be operating normally.	Approximately 150 Gal.
April 22 - 25, 2015	Sewer mainline appeared to be clogged and affecting the pump station.	Sump was inspected. Pumps were inspected and were found to be operating normally.	Approximately 150 Gal.
April 28, 2015	Sewer mainline appeared to be clogged and affecting the pump station.	Although no overflow was observed, PRASA cleaned all manholes through services from Rod Rodder. PRASA finally provided some assistance after continues calls from the Company.	Approximately 150 Gal.
April 30, 2015	Sewer mainline appeared to be clogged and affecting the pump station.	PRASA personnel installed a compressor and two vents into its main sewer line in order to unclog it. The work performed by PRASA was a result of several calls from the Company requesting PRASA's assistance. The next day PRASA personnel completed the work by cleaning the street and manhole adjacent to the affected area.	Approximately 150 Gal.
August 27, 2015	Sump levels fluctuating rapidly, during a rain event. Stormwater infiltration into sewer system is suspected.	An additional pump was rented and installed and the normal operation resumed soon after.	Approximately 200 Gal.